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August 13, 1999

Magalie Roman Salas  
Federal Communications Commission Secretary  
Portals II  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

Re: File No. NSD-L-99-24  
Docket No. 92-105

To the Secretary:

The California Department of Transportation (Caltrans) wishes to submit responses to several comments filed regarding the United States Department of Transportation (US DOT) petition requesting the Federal Communications Commission reserve an “Abbreviated Dialing Code (N11) to Access Intelligent Transportation System (ITS) Services Nationwide.” Caltrans strongly supports the US DOT petition and encourages the Federal Communications Commission to reserve an N11 number nationwide, for both urban and rural ITS applications.

## Pilot Deployments have been Completed

Regarding some commentators' requests for pilot ITS traveler information projects to explore the implementation issues for establishing multi-agency, multi-modal transportation information systems, we in California have already completed several tests and have such systems in the operational mode. Caltrans is the lead agency managing 1-800-COMMUTE (1-800-266-6883), California's first multi-agency, multi-modal traveler information system. Beyond 1-800-COMMUTE, we have participated in developing the multi-agency and multi-modal Yosemite Area Traveler Information System, the San Francisco Bay Area's TravInfo system operationally managed by the Metropolitan Transportation Commission, and the TranSierra system now owned and operated by MetroTraffic.

Caltrans handles the technical management and provides the funding for the entire 1-800-COMMUTE system. It handled over 2,300,000 calls in fiscal year 1998, and 2,500,000 in fiscal year 1999, helping travelers find the specific information they need regarding transit, rail, ridesharing, regional (urban) freeway traffic conditions, telecommuting, and even bicycling. It is one of the Advanced Traveler Information Systems that feature menus in both English and Spanish.

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Spanish. From its beginnings in 1994 as a partnership between Caltrans, the Los Angeles County Metropolitan Transportation Authority (LAC MTA), and the Southern California Association of Governments (SCAG), today 1-800-COMMUTE connects travelers to over fifty transportation providers, covering all of Southern California, San Diego, plus North-Central California/Lake Tahoe.

The 1-800-COMMUTE system clearly identifies each transportation provider and service, and does not have frequent unrelated or misdirected calls asking about jobs, locations of doctors, banks, or chauffeur services to supermarkets and concerts as commented. Our own consumer research studies, from both focus groups and statistically valid surveys, show widespread acceptance and a high degree of satisfaction with the system. Users rate the ease of use of 1-800-COMMUTE at 8.5 out of 10. Only N11 would rate higher. Fifty-two percent of the users call 1-800-COMMUTE for trips other than to or from work/school. Thirty-two percent of the users call 1-800-COMMUTE more than 10 times per month for traveler information/assistance. Ninety-two percent of callers confirm that the information they receive is accurate and helpful for their immediate trip needs.

Currently about 85 percent of the 1-800-COMMUTE callers want transit information. But the smaller transit agencies still primarily advertise their own seven-digit telephone number, listing 1-800-COMMUTE "for interregional traveler information." This is partially from wanting "brand recognition," and partially out of concern for requiring people to dial four additional digits. The N11 can alleviate these problems.

N11 can also help auto, train, and transit trips that cross city and county borders and require support from multiple providers. Today the consumer has to first find the right telephone number for the information provider, and then the provider cannot provide the complete trip information. With N11 people can get the information provider they need on the first call. And in the Southern California Priority Corridor, the SCAG-led project "Regional Transit Distributed Information Exchange" will soon share databases between transit providers. This will simplify the N11 telephone menu because consumers will be able to get real-time ridesharing and bus schedule, fare, and location information from the nearest provider, even when the trip requires transfers.

### New ITS Deployments

Caltrans is deploying several new transportation information systems to fight the negative impacts of freeway traffic congestion. Caltrans, in partnership with the US DOT, regional and local transportation agencies, is investing over \$36 million to rapidly deploy numerous advanced technology systems for better

transportation system management. These systems will advise commuters, truckers, and tourists on real-time traffic conditions, real-time transit information across transit operator territories, trains and ridesharing systems to improve mobility and decrease traffic congestion. Although the content is locally based in the Orange County, Los Angeles/Ventura, San Diego, and Inland Empire regions now covered by 1-800-COMMUTE, these systems strive for interoperability for consumers and commercial information resellers. Though these "Advanced Traveler Information Systems" disperse information through many different media/devices, the most widespread access will be the telephone. Effective telephone access relies on having a single, easy-to-use telephone number across all of these traveler information systems.

### Rural ITS is Important, Too

We also want to address comments requesting N11 not apply to rural Advanced Traveler Information Systems for road and weather conditions. We strongly feel that travelers need access to local/regional information wherever they may be, and that the simple N11 telephone access can be directed to rural applications just as well as urban systems. Our Caltrans Highway Information Network (1-800-427-ROAD) receives about 5,000,000 calls per year on interregional (rural) highway and weather conditions. This number is especially important in the winter months when major interregional routes may be closed or restricted due to mountain snows, mudslides, and flooding. This number is widely printed in the newspapers and other media, yet is virtually unknown to thousands of tourists and truckers coming into California's mountains and rural areas each year.

Caltrans would use a standard, national N11 number as a front end to its interregional highway traveler information system. We can further expand its functionality for new rural ITS applications now under development with the State of Oregon (California Oregon Advanced Transportation Systems) and in the rural Central Coast region between Santa Barbara and Santa Cruz. Having the same telephone number for rural and urban applications throughout the nation will help tourists and interstate truckers remember and use this access to critical routing, weather, and safety information.

### Compelling Public Need

Even with our success with the eleven-digit 1-800-COMMUTE and 1-800-427-ROAD, we recognize it is not easy to dial for traffic conditions while driving an automobile on a crowded freeway, or to reach interstate tourists and truckers. We explored getting a three-digit N11 for traveler information but found the California Public Utilities Commission will not act without the FCC first reserving the number nationally.

Magalie Roman Salas

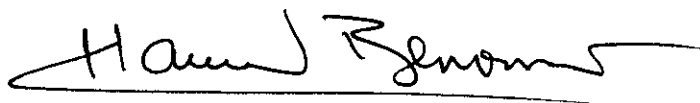
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California has a compelling public need to get traffic congestion and safety information to the public. California is the nation's largest state with many urban regions experiencing extremely high levels of traffic congestion. In 1998, California freeways were experiencing 836,000 vehicle hours of congestion per day, up 70 percent from just eight years ago. Being stuck in freeway traffic takes nearly 1.5 million gallons of fuel per day, adding 418 tons of vehicle emissions to our air. Productive time lost to freeway traffic congestion exceeds \$7.8 million per day.

With a common telephone number crossing over area codes and county lines, the Advanced Traveler Information Systems can reach the traveler before they reach the congestion/incident, while they still have choices of travel route, time of departure, or even to avoid the trip. Studies of the San Francisco Bay Area Travinfo system show that about 40 percent of the people receiving pre-trip information will modify their trip time, route, or mode upon finding out their intended route/mode is congested. Even when en route, about 25 percent of the people will change their route when told of incident-caused congestion ahead. In-vehicle Internet and similar devices are still several years away for widespread acceptance. The automobile industry estimates only one-third of new vehicles may be so equipped by 2006, so it will be at least 2020 before half of all vehicles in common use will have access. (The average age of a registered vehicle in California is 9.6 years old.) Only the telephone provides ubiquitous access to all members of our society. Effective dissemination of traveler information necessitates a consumer-friendly, safe, convenient N11 telephone number everyone can use.

Sincerely,

A handwritten signature in black ink, appearing to read "Hamed Benouar", with a long horizontal flourish extending to the right.

HAMED BENOUAR  
Program Manager  
Traffic Operations

c: File N. NSD-L-99-24 Docket No. 92-105  
Al McCloud, Network Services Division